

**IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF SOUTH
CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS)	Master Docket No.:
PRODUCTS LIABILITY LITIGATION)	2:18-mn-2873-RMG

CITY OF CAMDEN, et al.,)	Civil Action No.:
)	2:23-cv-03230-RMG

Plaintiffs,

-vs-

E.I. DUPONT DE NEMOURS AND COMPANY (n/k/a
EIDP, Inc.), et al.

Defendants.

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO CLASS ACTION
SETTLEMENT OBJECTIONS**

Settlement Class Counsel, together with The Chemours Company, The Chemours Company FC, LLC, DuPont de Nemours, Inc., Corteva, Inc., and E.I. DuPont de Nemours and Company (n/k/a/ EIDP, Inc.) (the “DuPont Entities”) (collectively, the “Parties”), move for an extension of time for an additional seven (7) days, until November 21, 2023, to respond to class action settlement objections, if any.

On August 22, 2023, this Court granted preliminary approval of the Parties’ class action settlement, and set certain deadlines related to settlement approval (ECF No. 3603). As relevant here, the deadline to object to the settlement was November 4, 2023 (ECF No. 3603). Class Counsel and Settling Defendants’ Counsel were required to respond to any objections by November 14, 2023 (ECF No. 3603).

On October 20, 2023, Metropolitan Water District of Southern California and the North Texas Municipal Water District (collectively the “Wholesalers”) moved to intervene for

limited purpose (ECF No. 3831) and sought an extension of time to seek settlement clarification (ECF No. 3832). On October 26, 2023, the Court granted the Wholesalers' motion to intervene for the limited purpose of considering the extension of time (ECF No. 3862). Although the Court denied the Wholesalers' motion for extension of time, the Court exercised its discretion to extend the objection deadline until November 11, 2023 (ECF No. 3862).

In light of the seven (7) day extension of the objection deadline, the Parties jointly seek to extend the deadline to respond to any objections by seven (7) days, from the current deadline of November 14, 2023 until November 21, 2023, in order to properly respond to any objections. The Parties believe this extension will allow them sufficient time to assess, confer, and respond to any objections.

Dated: November 2, 2023

Respectfully submitted,

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Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 2nd day of November, 2023, and was thus served electronically upon counsel of record.

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